

**U.S. Department of Justice**

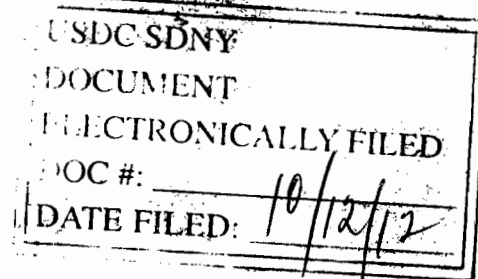
*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 9, 2012

By Fax

Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: US v. Ajemian et al., S1 11 Cr. 1091 (VM)

Dear Judge Marrero:

The Government respectfully submits this letter to request a one-week extension of the deadline for filing the Government's response to pretrial motions and a corresponding one-week extension of the deadline for defense replies.

At our conference of June 15, 2012, the Court set the following schedule: motions by September 7, 2012; opposition by October 9, 2012; and reply by October 26, 2012. By memo endorsement dated September 6, 2012, the Court granted the defendants' request to extend their deadline to September 14, 2012, and the Government's deadline to October 16, 2012. Thus, the schedule proposed by the Government at this time is as follows: Government response by October 23, 2012; defense replies by November 9, 2012. Our next conference date is December 7, 2012. I have communicated with defense counsel regarding our request and have received at least thirteen consents and no objections.

In addition, although the defendants have filed more than a dozen pretrial motions, supported by briefs and other materials totaling in excess of three hundred pages, the Government anticipates filing a single omnibus response to these motions, and believes that the total number of pages for this response will be far less than the number of pages comprising the motions. While it is too soon to make a firm prediction of the page length, the Government believes that its response would be less than half as long as the combined length of the motions to which it responds. The Government seeks

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permission to proceed in this manner, rather than filing multiple individual responses of 25 pages or less.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/ Justin S. Weddle
Daniel B. Tehrani
Justin S. Weddle
E. Danya Perry
Assistant United States Attorneys
212-637-2455/2312/2434

cc: All defense counsel (by electronic mail)

Request GRANTED. The briefing schedule with regard to the <u>pretrial</u> motions <u>by various defendants</u> herein is extended as set forth herein: motion papers submitted by _____; response <u>10-23-12</u> ; reply <u>11-8-12</u> . <u>The Government's response may exceed the Court's page limitations as set forth above.</u>	
SO ORDERED <u>10-12-12</u> DATE	 VICTOR MARRERO, U.S.D.J.